

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. S1-4:19 CR 291 RWS/JMB
	)	
DERON MITCHELL, JR.,	)	
	)	
Defendant.	)	

**MOTION FOR PRE-TRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Paul J. D'Agrosa, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with six counts of armed carjacking, in violation of Title 18, United States Code, Section 2119 and 2, which qualify as crimes of violence. He is also charged with six counts of brandishing a firearm in furtherance of those crimes of violence, in violation of Title 18, United States Code, Section 924(c).

2. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

3. The carjackings were committed from September, 2018 through early November, 2018. In each incident, either Defendant was armed with a handgun or the co-defendant was armed, or both of them were armed with a handgun.

4. In two carjackings, the male victim was made to strip off his clothing. In one of the carjackings (alleged in Counts Eleven and Twelve), the Defendant robbed two female victims at gunpoint of all of their personal belongings, while the co-defendant robbed the male victim of his vehicle.

5. In Count Seven, the Defendant and his co-defendant robbed a victim of both of his cars.

6. Defendant is also suspected of breaking into multiple vehicles, where the victim's personal property was stolen and ultimately recovered from Defendant and the co-defendant, after they was arrested fleeing from police in a stolen vehicle. On the date of Defendant's arrest, he was in possession of a loaded, semi-automatic handgun, that had been reported stolen.

7. In addition to fleeing from police in a stolen vehicle on November 6, 2018, Defendant was driving a stolen vehicle on November 4, 2018 when police tried to stop him. He fled from police, even after being tased by a police officer.

8. For these reasons, Defendant not only poses a danger to the community, he is also a flight risk.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

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UNITED STATES ATTORNEY

/s/Paul J. D'Agrosa  
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